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July 9, 2021

VIA ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Calcano v. Kamp-Rite Tent Cot Inc.* - Case No. 1:20-cv-09606-RA

Dear Judge Abrams:

We represent defendant Kamp-Rite Tent Cot Inc. ("Defendant") in the above-referenced matter. Together with counsel for plaintiff, Evelina Calcano, we jointly and respectfully move this Court to stay all case deadlines in this action for forty five (45) days, from July 9, 2021 to August 24, 2021.

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, the parties will file a stipulation of voluntary dismissal.

Respectfully submitted,

/s/ Timothy J. Straub
Timothy J. Straub

cc: All counsel of record (by ECF)

Application granted. The parties are directed to file either a status update or a stipulation of dismissal by August 24, 2021.

SO ORDERED.


Hon. Ronnie Abrams
07/13/2021